

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

IN RE:  
RAMON L RAMOS PEREZ  
MARISELA TORRES SOTO  
Debtor(s)

CASE NO. 05-09954 ESL  
CHAPTER 13

**MOTION IN REQUEST FOR ORDER TO LIFT THE STAY FOR  
LACK OF COMPLIANCE WITH PAYMENT AGREEMENT**

NOW COMES secured creditor Banco Popular de Puerto Rico (hereinafter "BPPR"), represented by the undersigned attorney who respectfully pray and state as follows:

1. On June 2, 2006, a hearing on a motion to lift stay filed by "BPPR" was held. On same date, upon the agreement of the parties an order was entered by this Honorable Court allowing debtor 30 days to file a stipulation, otherwise the automatic stay was to be lifted in favor of Movant.
2. On July 14, 2006, Debtor filed a motion requesting an additional extension of time of thirty (30) days to file an agreement with "BPPR". .
3. Said period of elapsed long time ago, and debtor did not cure the arrears.

**WHEREFORE**, it is respectfully requested from this Honorable Court an Order lifting the Stay in favor of Movant.

**CERTIFICATE OF ELECTRONIC FILING AND SERVICE**

I hereby certify that on this date copy of this motion has been electronically filed with the Clerk of the Court using the CM/ECF system which will sent notification of such filing to debtor(s) attorney and to US Chapter 13 Trustee.

In San Juan, Puerto Rico, on the 17<sup>th</sup> day of August, 2006

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